

THE LAW OFFICES OF SEAN M. MAHER, PLLC

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May 5, 2021

**VIA ECF**

**MEMO ENDORSED**

Hon. Sidney H. Stein  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Chimbo et al., (Junior Vladimir Jimenez-Castillo)  
19 Cr. 570 (SHS)

Dear Judge Stein:

On behalf of defendant Mr. Junior Jimenez-Castillo, I respectfully write to request, in light of the continued difficult conditions surrounding the COVID-19 pandemic, that the sentencing hearing currently scheduled for May 28, 2021 be adjourned 60-90 days, and that all sentencing submissions be adjourned in accordance with any new sentencing date set by the Court.

I have conferred with the government concerning the defense's adjournment request and have been informed by AUSA Kyle Wirshba that the government consents to the defense's request.

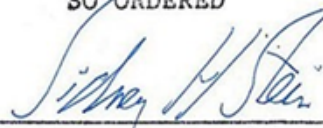
Respectfully submitted,

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/S/  
Sean M. Maher  
Counsel for Junior Jimenez-Castillo

cc: All counsel via ECF

**The sentencing is adjourned to August 11, 2021, at 11:00 a.m. and will take place in Courtroom 23A. The defense submissions are due by July 28, the government submissions are due by August 4.**

**Dated: New York, New York  
May 5, 2021**

SO ORDERED  
  
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SIDNEY H. STEIN  
U.S.D.J.